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Ditech Financial LLC
formerly known as
Green Tree Servicing LLC

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16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 Lee C. Kamimura, individually and all
others similarly situated,
19 Plaintiff,
20 vs.
21 Ditech Financial LLC formally known
as Green Tree Servicing, LLC,
22 Defendant.

23 Case No. 2:16-cv-00783-APG-CWH
JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
DEADLINE TO FILE
DEFENDANT'S RESPONSE TO
CLASS CERTIFICATION MOTION

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25 Plaintiff Lee C. Kamimura (“Plaintiff”) and Defendant Ditech Financial LLC,
26 fka Green Tree Services LLC (“Defendant” and together with Plaintiff, the
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1 "Parties") by and through their counsel of record hereby stipulate to extend the
2 motions deadline in this case as follows:

3 (1) The deadline for Defendant to file its opposition to Plaintiff's motion for
4 class certification will be March 28, 2018.

5 (2) The deadline for Plaintiff to file his reply will be April 11, 2018.

6 The current deadline to file dispositive motions is March 21, 2018. ECF No.
7 59.

8 Good cause exists to amend the deadline by which Defendant must file its
9 opposition to Plaintiff's Motion for Class Certification. The parties originally
10 agreed that Defendant would have three weeks to respond to the Motion. ECF No.
11 26, p. 3:14-16; ECF No. 40, p. 2:18-20; ECF No. 42, p. 2:15-18; and ECF No. 42, p.
12 2:12-15. When the parties stipulated that Plaintiffs could have an extension to file
13 the Motion for Class Certification, they inadvertently failed to include Defendant's
14 response date in that stipulation. ECF No. 52. Therefore, this stipulation is
15 necessary to effectuate the parties' agreement that Defendant will have 21 days to
16 respond to Plaintiff's Motion for Class Certification.

17 The Parties are also continuing to actively discuss an informal resolution to
18 this matter.

19 The Parties respectfully propose the following briefing schedule:

20 (1) The deadline for Defendant to file its opposition to Plaintiff's motion for
21 class certification will be March 28, 2018.

22 (2) The deadline for Plaintiff to file his reply will be April 11, 2018.

23 The Court has not yet set a hearing for the Motion for Class Certification.
24 Therefore, these seven-day extensions will not affect any previous hearing dates set
25 by the Court.

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1 This is the Parties' seventh request for an extension of the class certification
2 motion deadlines, but the first request for an extension of the response deadline for
3 the opposition to the class certification motion.

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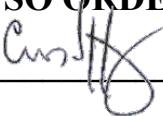
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1 **[PROPOSED] ORDER**

2 IT IS HEREBY ORDERED that: The deadline for Defendant to file an
3 opposition to Plaintiff's motion for class certification will be March 28, 2018, and
4 Plaintiff's deadline to file his reply will be April 11, 2018.

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6 **IT IS SO ORDERED.**

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9 **UNITED STATES MAGISTRATE JUDGE**

10 Dated: March 14, 2018

11 4836-0890-4799, v. 1

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